

# FairLaw Firm



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To:  
Cruz Valdivieso Figueroa



## INVOICE

Open (Not Sent)

Invoice # 563  
Invoice Date: 12/22/2023



Amount due  
172,825.88

## Services

Date	Staff Member	Category	Description	Duration	Total
8/15/2022	Brian H. Pollock Esq.	Legal	Initial consultation with client; discuss claims, what to expect, and review sign-up procedures	1.00	550.00
8/17/2022	Bridget Obando	Receipt, Review, and Analysis	Receive, Analyze and scan all documents provided by client.	0.70	105.00
8/19/2022	Brian H. Pollock Esq.	Draft/revise	Draft Complaint	1.20	660.00
8/19/2022	Brian H. Pollock Esq.	Legal	Review documents provided by client prior to filing Complaint	0.50	275.00
8/22/2022	Brian H. Pollock Esq.	Draft/revise	Draft summonses for each Defendant (x4) and conduct online research re: same	0.50	275.00
8/22/2022	Bridget Obando	Draft/revise	Draft Civil Cover Sheet, finalize complaint and summons to all four defendants, file and audit file case.	0.40	60.00
8/22/2022	Brian H. Pollock Esq.	Legal	Receipt and review of Clerks' Notice of Judge Assignment (Judge Dimitrouleas and Magistrate Judge Hunt)	0.10	55.00
8/22/2022	Brian H. Pollock Esq.	Legal	Receipt and review of Summonses issued to each Defendant (x4)	0.30	165.00
8/23/2022	Brian H. Pollock Esq.	Draft/revise	Drafted letter to client in both english and spanish re: preservation of evidence	0.40	220.00
8/23/2022	Brian H. Pollock Esq.	Draft/revise	Drafted letter to client in both english and spanish re: case being filed in federal court	0.40	220.00
8/23/2022	Bridget Obando	Receipt, Review, and Analysis	Receive, analyze, and update case for Issued summons, send over to process server for service.	0.30	45.00
8/23/2022	Bridget Obando	Receipt, Review, and Analysis	Receive, Analyze and organize documents sent by client for discovery including timesheets via text messages,	0.30	45.00
8/23/2022	Bridget Obando	Draft/revise	Draft Notice of Appearance for Toussaint Cummings, Esq. and send to attorney for approval.	0.20	30.00
8/23/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze ECFs Nos 5 and 6.	0.40	140.00
8/24/2022	Bridget Obando	Receipt, Review, and Analysis	Receive and review order requiring joint scheduling report and discovery.	0.20	30.00
8/24/2022	Bridget Obando	Receipt, Review, and Analysis	Receive and revise witness list from client.	0.20	30.00
9/1/2022	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	165.00
9/2/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and review summons served to defendant All Vip Care. Update file audit.	0.20	30.00
9/2/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and review summons served to defendant Leigh-Ann. Update file audit.	0.20	30.00
9/2/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and review summons served to defendant John Corrigan. Update file audit.	0.20	30.00
9/2/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Notice to Parties in FLSA Cases	0.20	110.00
9/9/2022	Brian H. Pollock Esq.	Teleconference with	T/c with and then call with Judge Dimitrouleas to address the dismissal of the wrong Defendant; then, draft email re: same	0.30	165.00
9/12/2022	Brian H. Pollock Esq.	Draft/revise	Exchange emails with defense counsel re: their representation of All VIP Care Inc. and the docket issues	0.20	110.00
	Brian H.		Draft Amended Complaint (to be filed once defense counsel appears) to include Ms. Velazquez McKinnon as an additional		

9/12/2022	Brian H. Pollock Esq.	Draft/revise	Appears to include Ms. Valdivieso McKinnon as an additional Defendant; also, Draft proposed Summons and NOF Summons for same	0.50	275.00
9/12/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Corrected Order of Dismissal	0.10	55.00
9/21/2022	Bridget Obando	Draft/revise	Draft notice of filing return of service.	0.30	45.00
9/21/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and analyze return of service on defendant.	0.20	30.00
9/23/2022	Brian H. Pollock Esq.	Legal	T/c with defense counsel to request the time and pay records for Ms. Valdivieso to assist with preparing a more accurate statement of claim	0.20	110.00
9/27/2022	Brian H. Pollock Esq.	Legal	Tc with defense counsel re: their position that Plaintiff was an IC and that she signed a noncompete and violated it, the records to be reviewed/exchanged, and the potential for resolution	0.20	110.00
9/29/2022	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	165.00
10/6/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Answer and (4) Affirmative Defenses	0.40	220.00
10/6/2022	Brian H. Pollock Esq.	Draft/revise	Revise and finalize the Amended Complaint for filing	0.10	55.00
10/10/2022	Brian H. Pollock Esq.	Draft/revise	Draft proposed Summons on Ms. McKinnon and Notice of Filing for same	0.30	165.00
10/10/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of email from defense counsel re: retaliatory lawsuit filed against Ms. Valdivieso in state court; then, review lawsuit to determine its timing as after the filing of the FLSA case, and conduct research re: lawsuit as FLSA retaliation	0.90	495.00
10/10/2022	Brian H. Pollock Esq.	Draft/revise	Draft email to Ms. Valdivieso re: the retaliatory Complaint filed against her	0.20	110.00
10/18/2022	Bridget Obando	Draft/revise	Draft Joint scheduling Report and proposed schedule, send to toussaint to approve.	0.50	75.00
10/18/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Review and approve joint scheduling report and schedule.	0.20	70.00
10/19/2022	Bridget Obando	Email Communication	Email exchange with opposing counsel regarding joint scheduling report.	0.20	30.00
10/20/2022	Brian H. Pollock Esq.	Draft/revise	Drafted letter enclosing amended complaint to client in both english and spanish	0.30	165.00
10/24/2022	Brian H. Pollock Esq.	Draft/revise	Conduct legal research and then draft the Second Amended Complaint to include the FLSA Retaliation claim	0.60	330.00
10/24/2022	Brian H. Pollock Esq.	Draft/revise	Revise the proposed Joint Scheduling Report and then draft email to defense counsel to confer re: same and the filing of a Second Amended Complaint	0.50	275.00
10/25/2022	Brian H. Pollock Esq.	Draft/revise	Further revise the proposed Second Amended Complaint; then, draft Motion for Leave and proposed Order Granting same	0.80	440.00
10/25/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and send email issued summons to process server.	0.20	30.00
10/27/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt, review, and deadline Trial Order.	0.30	45.00
10/28/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting M/Amend	0.10	55.00



10/31/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt review, and update case on return of service	0.30	45.00
10/31/2022	Brian H. Pollock Esq.	Draft/revise	Drafted letter to client in regards to trial date in both english and spanish	0.40	220.00
10/31/2022	Bridget Obando	Email Communication	Multiple emails with opposing counsel regarding trial order.	0.30	45.00
11/3/2022	Bridget Obando	Phone Call	Phone call with opposing counsel assistant regarding case.	0.30	45.00
11/3/2022	Bridget Obando	Draft/revise	Draft notice of mediator selection.	0.20	30.00
11/3/2022	Bridget Obando	Draft/revise	Draft mediation order.	0.20	30.00
11/3/2022	Bridget Obando	Email Communication	email exchange with mediator Neil Flaxman regarding mediation.	0.20	30.00
11/3/2022	Bridget Obando	Phone Call	Phone call with client.	1.00	150.00
11/7/2022	Brian H. Pollock Esq.	Draft/revise	Revise the INTs to the corporate Defendant and then draft INTs to the individual Defendant; also, revise the RFPs to Defendants	0.80	440.00
11/7/2022	Shakira Brizuela	FLSA - Plaintiff	Telephone conference with client requesting from client the name of any Supervisors or Managers she had that had knowledge of her work or schedule and any clients that had knowledge of her work or schedule.	0.30	45.00
11/7/2022	Shakira Brizuela	FLSA - Plaintiff	Drafted Rule 26 disclosure. Sent to attorney for review.	0.80	120.00
11/7/2022	Shakira Brizuela	FLSA - Plaintiff	Telephone conference requesting hours worked and hours paid for.	0.20	30.00
11/7/2022	Brian H. Pollock Esq.	Legal	Revise the Rule 26 Disclosures and analyze the materials to be produced	1.40	770.00
11/7/2022	Brian H. Pollock Esq.	Legal	Draft Notice of Related Action	0.20	110.00
11/7/2022	Shakira Brizuela	FLSA - Plaintiff	Bate Stamped Rule 26 Disclosure documents.	0.20	30.00
11/7/2022	Brian H. Pollock Esq.	Legal	Revise and finalize the Notice of Mediation and proposed Order	0.20	110.00
11/9/2022	Bridget Obando	Receipt, Review, and Analysis	Finalize and serve rule 26 disclosure on opposing counsel.	0.20	30.00
11/9/2022	Shakira Brizuela	FLSA - Plaintiff	Receipt and review of email records provided by client.	0.40	60.00
11/11/2022	Brian H. Pollock Esq.	Draft/revise	Further revise the discovery to Defendants and then draft email to defense counsel enclosing and regarding same	0.30	165.00
11/15/2022	Bridget Obando	Receipt, Review, and Analysis	File Audit case.	0.30	45.00
12/6/2022	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	165.00
12/9/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Notice of Appearance by Mr. Goldberg for the corporate Defendant	0.10	55.00
12/9/2022	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Notice of Appearance by Mr. Goldberg for the individual Defendant	0.10	55.00
1/2/2023	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze case law on home health aide exemptions based on Defendant's affirmative defenses.	0.40	150.00



1/2/2023	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze answer and affirmative defenses to second amended complaint at ECF 28.	0.30	112.50
1/2/2023	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Defts Motion for Leave to Amend Answer and proposed amended answer at ECF 31.	0.70	262.50
1/17/2023	Bridget Obando	Phone Call	Phone call with client.	0.20	30.00
1/17/2023	Brian H. Pollock Esq.	Legal	Continue to conduct legal research and to draft Response in Opposition to Motion to Amend	1.30	715.00
1/18/2023	Bridget Obando	Email Communication	Email to opposing counsel.	0.10	15.00
1/25/2023	Shakira Brizuela	Phone Call	Telephone conference with client. Reviewed docket and provided case status. Client asked to be called back with confirmation on how the fee agreement will work with her two cases.	0.20	30.00
1/25/2023	Shakira Brizuela	FLSA - Plaintiff	Consulted with attorney regarding fee agreement.	0.10	15.00
1/25/2023	Shakira Brizuela	Phone Call	Telephone call with client explaining fee agreement.	0.10	15.00
1/26/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Order at ECF 36 granting Defts motion to amend Answer to include counterclaims.	0.20	75.00
2/1/2023	Adrian Castillo	Email Communication	Email sent to OC in order to agree to a mediation date. Per OC's email they will get back to me to confirm once it has been discussed with their clt.	0.20	35.00
2/3/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze 46 pages of defendants answer, affirmative defenses, counterclaim and attached documents at ECF 37.	1.20	450.00
2/3/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defendant's responses to interrogatories to McKinnon.	0.30	112.50
2/3/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defendant's responses to interrogatories to All VIP.	0.70	262.50
2/3/2023	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Read and respond to email from opposing counsel re: discovery.	0.30	112.50
2/3/2023	Bridget Obando	Paralegal	Discuss case with Toussaint, file audit case and discuss discovery.	0.30	45.00
2/6/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defs Rule 26 disclosure statement.	0.20	75.00
2/6/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Initial analysis of responses to Plaintiffs RFP sent by opposing counsel.	0.80	300.00
2/9/2023	Toussaint M. Cummings, Esq.	Draft/revise	Initial draft of answer and affirmative defenses to Counterclaim.	0.80	300.00
2/9/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft motion to dismiss counter-complaint and research all cases included therein.	3.60	1,350.00
2/16/2023	Brian H.	Draft/revise	Drafted notice of unavailability	0.20	110.00

2/19/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Initial review of Defendant's response to Plaintiff's MTD counterclaim.	0.30	112.50
2/21/2023	Toussaint M. Cummings, Esq.	Draft/revise	Drafted letter to client in both English and Spanish regarding their in person deposition	0.40	150.00
3/7/2023	Bridget Obando	Receipt, Review, and Analysis	Review case tasks to update case file.	0.20	30.00
3/7/2023	Bridget Obando	Email Communication	Email exchange to Neil Flaxman regarding rescheduling mediation.	0.20	30.00
3/9/2023	Bridget Obando	Email Communication	Email to mediator.	0.10	15.00
3/9/2023	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	165.00
3/10/2023	Bridget Obando	Email Communication	Email to opposing counsel.	0.10	15.00
3/20/2023	Bridget Obando	Email Communication	Email to opposing counsel regarding mediation, access Neil Flaxman schedule and offer new dates.	0.20	30.00
3/21/2023	Bridget Obando	Email Communication	Email exchange with Neil regarding mediation.	0.20	30.00
3/21/2023	Bridget Obando	Draft/revise	Draft mediation letter to client in spanish.	0.30	45.00
3/21/2023	Bridget Obando	Draft/revise	Draft mediation letter to client in english.	0.30	45.00
3/22/2023	Bridget Obando	Draft/revise	Draft rescheduling notice for meditation.	0.30	45.00
3/22/2023	Bridget Obando	Draft/revise	Draft proposed order.	0.20	30.00
3/23/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Review documents in file in advance of deposition preparation with client.	0.40	150.00
3/23/2023	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Deposition preparation with client. Bridget translating.	1.90	712.50
3/23/2023	Bridget Obando	Paralegal	Assist Toussaint in translating pre deposition for client.	2.00	300.00
3/23/2023	Bridget Obando	Email Communication	Email to Neil Flaxman.	0.10	15.00
3/27/2023	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Read and respond to emails from opposing counsel re: resetting deposition.	0.20	75.00
3/28/2023	Bridget Obando	Draft/revise	Draft letter for rescheduling mediation in english.	0.30	45.00
3/28/2023	Bridget Obando	Draft/revise	Draft letter for rescheduling mediation in spanish.	0.30	45.00
3/28/2023	Bridget Obando	Email Communication	Email to client.	0.10	15.00
3/29/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze order rescheduling mediation at ECF 42.	0.10	37.50
	Toussaint M. Cummings, Esq.	Draft/revise	Draft letter to client regarding mediation and deposition.	0.30	112.50



3/30/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze email from opposing counsel advising that deposition witness no longer works for Def.	0.10	37.50
4/3/2023	Toussaint M. Cummings, Esq.	Draft/revise	Drafted deposition letter to client in both english and spanish	0.40	150.00
4/6/2023	Toussaint M. Cummings, Esq.	Email Communication	Read and respond to email from Carlos Arce, Esq. advising that Randy Goldberg is in hospital and cancelling tomorrow's deposition.	0.20	75.00
4/7/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze court order denying motion to dismiss at ECF 43.	0.40	150.00
4/10/2023	Toussaint M. Cummings, Esq.	Email Communication	Email communication with Carlos Arce re: cancelling deposition of Plaintiff on April 10.	0.20	75.00
4/19/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Research labyrinth of federal laws concerning the companionship services exemption to FLSA.	1.50	562.50
4/19/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft notes detailing laws pertaining to the claim.	0.50	187.50
4/20/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish drafting answer and affirmative defenses to counterclaim.	0.90	337.50
4/24/2023	Bridget Obando	Draft/revise	Draft letter to client enclosing discovery in english.	0.20	30.00
4/24/2023	Bridget Obando	Draft/revise	Draft letter to client enclosing discovery in spanish.	0.20	30.00
4/24/2023	Bridget Obando	Draft/revise	Begin drafting responses to request for production.	0.50	75.00
5/5/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defts Response to Plaintiff's Answer and Affirm Defenses to Counter Claim at ECF 45.	0.10	37.50
5/8/2023	Toussaint M. Cummings, Esq.	Draft/revise	Drafted notice of deposition for Corporate representative and Liz Mckinnon	0.60	225.00
5/16/2023	Toussaint M. Cummings, Esq.	Depositions	Conduct deposition of Corp Rep Liz McKinnon.	3.50	1,312.50
5/16/2023	Toussaint M. Cummings, Esq.	Depositions	Draft questions in preparation for deposition of Liz McKinnon as CR.	0.90	337.50
5/16/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Review client file in preparation for deposition of corporate rep.	0.50	187.50
5/17/2023	Bridget Obando	Receipt, Review, and Analysis	Receipt and review email from opposing counsel.	0.10	15.00
5/17/2023	Bridget Obando	Email Communication	Email reply to opposing counsel.	0.10	15.00
5/18/2023	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	165.00
5/24/2023	Brian H. Pollock Esq.	Legal	Conduct legal research re: whether a nurse registry is automatically protected from an FLSA Overtime claim; review cases that say it is not (and that either deny MSJ to the Defendant or grant MSJ to the plaintiff as an employee)	1.00	550.00

6/6/2023	Toussaint M. Cummings, Esq.	Depositions	Attend client's deposition.	3.00	1,125.00
6/7/2023	Toussaint M. Cummings, Esq.	Depositions	Conduct deposition of Diana Ramirez.	3.00	1,125.00
6/7/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft questions in preparation for deposition of Diana Ramirez.	0.80	300.00
6/7/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze all documents in client file in preparation for deposition of Diana Ramirez.	0.50	187.50
6/7/2023	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Strategy discussion with Brian Pollock.	0.20	75.00
6/8/2023	Bridget Obando	Draft/revise	Draft responses to request for production.	0.50	75.00
6/11/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze all client's paystubs provided by ALL VIP in preparation to calculate overtime damages.	1.40	525.00
6/12/2023	Toussaint M. Cummings, Esq.	Draft/revise	Calculate damages by creating spreadsheet of all overtime owed.	1.30	487.50
6/12/2023	Toussaint M. Cummings, Esq.	Email Communication	Email exchange with opposing counsel re discovery and mediation.	0.50	187.50
6/12/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze case law on FLSA superseding case law in nurse registry scenarios.	1.80	675.00
6/12/2023	Toussaint M. Cummings, Esq.	Arbitrators/mediators	Attend mediation.	3.50	1,312.50
6/12/2023	Bridget Obando	Phone Call	Phone call with witness Ana Maria.	0.30	45.00
6/12/2023	Bridget Obando	Phone Call	Phone call with witness Melendez.	0.10	15.00
6/12/2023	Bridget Obando	Paralegal	Assist in translating mediation.	3.60	540.00
6/13/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze third party subpoena to Senior Nannies prepared by opposing counsel.	0.40	150.00
6/13/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze deposition notice for five witnesses prepared by opposing counsel.	0.10	37.50
6/13/2023	Toussaint M. Cummings, Esq.	Email Communication	Read and respond to email from opposing counsel.	0.20	75.00
6/13/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze request for admissions and second request for production sent by opposing counsel.	0.70	262.50
6/15/2023	Brian H. Pollock Esq.	Legal	Review file and then send email to defense counsel to address the improper inclusion of her date of birth and ss number in the Exhibit to the Amended Answer to the Second Amended Complaint and that she considers same as part of the	0.50	275.00



6/15/2023	Brian H. Pollock Esq.	Draft/revise	Review file and conduct some legal research, then, begin to draft the MSJ on the issues of employment, preemption, and other issues	3.20	1,760.00
6/19/2023	Brian H. Pollock Esq.	Legal	Review file for what has and needs to be done; draft File Audit	0.50	275.00
6/20/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call to potential witness Angela Melendez.	0.40	150.00
6/21/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call with OC Randy Goldberg re: extending discovery deadline.	0.20	75.00
7/3/2023	Toussaint M. Cummings, Esq.	Draft/revise	Revise Introduction and Section A to Argument of MSJ by including new caselaw and evidence incorporated from Statement of Material Facts.	3.10	1,162.50
7/3/2023	Toussaint M. Cummings, Esq.	Draft/revise	Begin drafting Statement of Material Facts after analyzing evidence produced in discovery and on docket.	2.50	937.50
7/5/2023	Toussaint M. Cummings, Esq.	Draft/revise	Revise Section B of Argument to include new case law and facts. Review evidence in case file to add to statement of material facts.	3.10	1,162.50
7/6/2023	Toussaint M. Cummings, Esq.	Draft/revise	drafting the letter to client enclosing deposition transcript	0.10	37.50
7/13/2023	Bridget Obando	Receipt, Review, and Analysis	Receipt email from client and translate to toussaint.	0.20	30.00
7/16/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish drafting argument for Section B, factor 1: control.	3.30	1,237.50
7/16/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze deposition of Plaintiff in preparation to draft argument section of MSJ. Continue analyzing all other depositions and exhibits for use in Statement of Material Facts.	2.40	900.00
7/16/2023	Toussaint M. Cummings, Esq.	Draft/revise	Continue drafting statement of material facts.	0.90	337.50
7/17/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish Drafting Section B factors 2-5.	5.80	2,175.00
7/17/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze case law on factors 2-5 of the economic reality test to incorporate in argument section of MSJ.	2.50	937.50
7/18/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish drafting Section B factor 6. Draft Revise order of Argument sections and draft Sections A and D, and Conclusion. Proofread and revise entire motion for summary judgment.	7.50	2,812.50
7/18/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish drafting Statement of Material Facts.	1.30	487.50
7/18/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Research case law on individual liability for FLSA defendants to include in Section D of motion for summary judgment.	2.10	787.50
7/18/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defendant's Motion for Summary judgment, Statement of Material Facts and attached Exhibits	1.50	562.50

7/19/2023	Toussaint M. Cummings, Esq.	Draft/revise	Revise statement of material facts and motion for summary judgment based on order striking both at ECF NO. 63.	3.80	1,425.00
7/20/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft motion for extension of time nunc pro tunc for MSJ and SMF.	0.30	112.50
7/20/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call and email to Randy Goldberg attempting to confer on MET NPT.	0.20	75.00
7/25/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defendant's Motion for Summary Judgment and Statement of Material Facts at ECF Nos. 57 and 58.	1.90	712.50
7/25/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft motion for extension of time to respond to defense MSJ.	0.50	187.50
7/25/2023	Toussaint M. Cummings, Esq.	Email Communication	Read and respond to emails from opposing counsel conferring on motion for extension of time.	0.20	75.00
7/26/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft Response to Defts MSJ: Section A part I and beginning of part 2.	4.70	1,762.50
7/26/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze case law cited in Defts MSJ and related cases.	1.40	525.00
7/27/2023	Toussaint M. Cummings, Esq.	Draft/revise	Continue drafting Section A, Part 2. Continue conducting research on analysis of three tests to determine IC v. employee.	5.60	2,100.00
7/28/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finish Drafting Section A, part 2. Begin Drafting Section C, Parts I and II.	4.40	1,650.00
7/28/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze VIPs MSJ and all cited exhibits to dispute arguments re: Section C, Parts I and II.	2.50	937.50
7/28/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call to witness Ana Maria Rowland re: declaration.	0.50	187.50
7/28/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft declaration of Rowland.	0.40	150.00
7/28/2023	Toussaint M. Cummings, Esq.	Draft/revise	Draft Cruz Declaration and send to Reyna for translation.	0.50	187.50
7/30/2023	Toussaint M. Cummings, Esq.	Draft/revise	Response to MSJ - Continue Drafting Section C, Parts II and begin Part III. Begin Drafting Section B also.	5.10	1,912.50
7/30/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze VIPs MSJ and all cited exhibits to dispute arguments re: Sections B and C, Parts II and III.	2.00	750.00
7/31/2023	Toussaint M. Cummings, Esq.	Draft/revise	Response to MSJ - Continue Drafting Section C, Part III. Finish Drafting Section B after conducting research demonstrating no valid claim for FLSA retaliation.	5.50	2,062.50
8/1/2023	Toussaint M. Cummings, Esq.	Draft/revise	Finalize All Sections of Response to MSJ and Finalize Statement of Material Facts.	8.00	3,000.00



8/2/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Perform legal research to ensure all citations are properly referenced.	1.00	375.00
8/8/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Defts Reply and Reply to Statement of Material Facts at ECF Nos. 76 and 77.	1.20	450.00
8/8/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Order striking Reply at ECF No. 78.	0.20	75.00
8/24/2023	Toussaint M. Cummings, Esq.	Draft/revise	draft N/Dissociation of Counsel	0.20	75.00
8/28/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting Mr. Cummings' withdrawal as counsel for Plaintiff	0.10	55.00
9/5/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Court's Order Granting in Part and Denying in Part the Defendants' MSJ; then, draft email to client enclosing and regarding the same and its meaning to her	1.10	605.00
9/5/2023	Brian H. Pollock Esq.	Legal	Review depositions of Plaintiff, Ms. Velazquez McKinnon, and Ms. Ramirez to identify potential issues to be addressed in limine and then draft email to defense counsel regarding same, appetite for settlement, and pre-trial issues	1.10	605.00
9/13/2023	Brian H. Pollock Esq.	Draft/revise	Begin drafting proposed Jury Instructions	1.20	660.00
9/14/2023	Brian H. Pollock Esq.	Draft/revise	Conduct legal research and draft Proposal for Settlement to Defendant, ALL VIP, for as related to Counts I, II, and IV of the Counterclaims	0.60	330.00
9/14/2023	Brian H. Pollock Esq.	Draft/revise	Conduct additional legal plus factual research in file; then, draft Proposal for Settlement to ALL VIP for Counts III and IV of the Second Amended Complaint	0.60	330.00
9/21/2023	Brian H. Pollock Esq.	Draft/revise	Continue to draft proposed Jury Instructions and conduct research for same	0.50	275.00
9/21/2023	Brian H. Pollock Esq.	Draft/revise	Draft conferral email to defense counsel re: additional limine and pre-trial stipulation issues	0.30	165.00
9/22/2023	Brian H. Pollock Esq.	Draft/revise	Begin to draft Pre-Trial Stipulation	2.20	1,210.00
9/29/2023	Luna Alvey Esq.	Draft/revise	Draft motion in limine; legal research regarding same.	2.60	1,040.00
9/29/2023	Brian H. Pollock Esq.	Draft/revise	REvise the draft of the M/Limine and conduct research for same	1.30	715.00
10/1/2023	Brian H. Pollock Esq.	Legal	Review Defendants' revisions to the Pre-Trial Stipulation and then further revise same	0.80	440.00
10/2/2023	Brian H. Pollock Esq.	Draft/revise	Further revise the Motion in Limine and conduct additional legal research for same	1.70	935.00
10/2/2023	Brian H. Pollock Esq.	Draft/revise	Further revise the proposed Joint Pretrial Stipulation and then email Mr. Goldberg same and to address the trial Exhibit and Witness Lists	1.00	550.00
10/2/2023	Steffany Sanguino	Paralegal	Trial Exhibits were put together, and the Exhibit and Witness lists were drafted.	2.00	330.00
10/3/2023	Brian H. Pollock Esq.	Legal	Review and organize the proposed Exhibits for use at trial and redact social security numbers and date of birth from documents to be used as Exhibits	0.80	440.00
10/3/2023	Brian H. Pollock Esq.	Legal	Revise the proposed Witness List for use at trial and review of	0.40	220.00

10/3/2023	Pollock Esq.	Draft/revise	file to identify witnesses	0.40	220.00
10/4/2023	Steffany Sanguino	Paralegal	A new Exhibit List draft has been created.	0.60	99.00
10/4/2023	Brian H. Pollock Esq.	Draft/revise	Revise the proposed Exhibit List and share same, along with the Witness List I revised, with defense counsel	1.30	715.00
10/5/2023	Steffany Sanguino	Paralegal	I completed putting together our Exhibits into a folder for use at trial	0.60	99.00
10/5/2023	Brian H. Pollock Esq.	Draft/revise	Continue to conduct legal research for, to compile record citations for, and to draft Plaintiff's Motion in Limine	3.80	2,090.00
10/5/2023	Brian H. Pollock Esq.	Legal	Review the proposed Exhibits and remove documents that we are not likely to use at trial from the materials compiled	0.90	495.00
10/5/2023	Brian H. Pollock Esq.	Legal	Exchange emails with defense counsel re: the Exhibit and Witness Lists; also, receive Defendant's Witness and Exhibit Lists and incorporate my objections to same	1.00	550.00
10/6/2023	Brian H. Pollock Esq.	Draft/revise	Continue to research, draft, and finalize Plaintiff's Motion in Limine	2.80	1,540.00
10/6/2023	Brian H. Pollock Esq.	Draft/revise	Review the actual Exhibits that the defense intends to offer into evidence and revise objections to be incorporated on the Exhibit List to identify particular documents	0.80	440.00
10/6/2023	Brian H. Pollock Esq.	Draft/revise	Conduct legal research re: issues in the Pre-Trial Stipulation, revise same, and exchange emails with defense counsel re: the Pre-Trial Stipulation	2.20	1,210.00
10/6/2023	Steffany Sanguino	Paralegal	I called the client to let her know about the hearing on 10/20	0.10	16.50
10/6/2023	Steffany Sanguino	Paralegal	I spoke with the client and let her know we have the hearing on October 20 to learn when we are going to trial. I told the client we would contact her after October 20 to schedule a meeting.	0.10	16.50
10/9/2023	Brian H. Pollock Esq.	Legal	Re-read depositions of Ms. McKinnon and Ms. Ramirez in preparation for trial; also, review and organize the time records made by Ms. Valdivieso and then draft email to Mr. Goldberg to try and resolve some of his objections to the trial exhibits	3.30	1,815.00
10/9/2023	Brian H. Pollock Esq.	Teleconference with	T/c with Ana Marie Rowland to discuss her appearance at trial and anticipated testimony; then, draft trial subpoena and letter accompanying same to her	1.00	550.00
10/10/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring Part of MIL to Magistrate Judge	0.20	110.00
10/10/2023	Brian H. Pollock Esq.	Draft/revise	Continue to conduct legal research and research in file to draft the proposed Jury Instructions; then, draft email to Mr. Goldberg enclosing same	2.90	1,595.00
10/10/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring Part of the MIL to Magistrate Judge	0.20	110.00
10/10/2023	Brian H. Pollock Esq.	Draft/revise	Begin to draft the Verdict Form	1.00	550.00
10/11/2023	Steffany Sanguino	Paralegal	Combine all timesheets for Ms. Valdivieso and then draft email to OC enclosing them for his review	0.40	66.00
10/11/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Amended Objections to Plaintiff's Trial Exhibits (the amendments now include objections to items that appear on Defendants' Exhibit List)	0.20	110.00
10/11/2023	Brian H. Pollock Esq.	Draft/revise	Begin to draft the proposed Verdict Form and review file for same	1.60	880.00
10/11/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Revised Objections to the Plaintiff's Exhibit	0.30	165.00



10/12/2023	Brian H. Pollock Esq.	Draft/revise	Conduct legal research and research in file for the continued drafting of the Verdict Form	1.10	605.00
10/12/2023	Brian H. Pollock Esq.	Draft/revise	Exchange emails with Mr. Goldberg in an effort to streamline the issues by offering to stipulate to a contract to avoid the Promissory Estoppel Claim	0.30	165.00
10/12/2023	Brian H. Pollock Esq.	Draft/revise	Draft email to Mr. Goldberg to again request his proposed revisions to the Jury Instructions and receive response from Mr. Goldberg re: his focusing on responding the MIL	0.20	110.00
10/13/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Return of Service of Subpoena for Trial has been received (Ana Maria Rowland).	0.20	110.00
10/13/2023	Brian H. Pollock Esq.	Legal	T/c with Mr. Goldberg to discuss the issues in the case in response to his email and jointly requesting that we extend some deadlines; then, draft proposed Joint Motion and email it to him for his review/commentary	1.00	550.00
10/13/2023	Brian H. Pollock Esq.	Draft/revise	Draft Motion to Amend Joint Pretrial Stipulation and email to Mr. Goldberg re: same	0.50	275.00
10/13/2023	Steffany Sanguino	Paralegal	Compile the proposed Joint Exhibit List and organize proposed Joint Exhibits into a folder to be shared	2.50	412.50
10/13/2023	Steffany Sanguino	Paralegal	Plaintiff's Trial Exhibit List with Defendants Objections has been out together	0.60	99.00
10/13/2023	Steffany Sanguino	Paralegal	Finalize the proposed Joint Exhibit List and draft email to OC enclosing it for his review	0.40	66.00
10/13/2023	Brian H. Pollock Esq.	Legal	Review the proposed Joint Exhibits and Joint Exhibit List to be shared with Defense counsel; also, review the revised Plaintiff's Exhibit List	0.40	220.00
10/13/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting Joint MET to file Jury Instructions, Verdict Form, and Response to MIL	0.10	55.00
10/13/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting Joint Motion to Amend Joint PreTrial Stipulation	0.10	55.00
10/16/2023	Steffany Sanguino	Paralegal	I called the client to schedule an in-person meeting.	0.10	16.50
10/16/2023	Brian H. Pollock Esq.	Legal	Continued trial preparations - exchange emails with defense counsel re: Joint Pretrial Stipulation, Jury Instructions, Exhibits, and then draft/revise same. Also, draft and revise the proposed Verdict Form and begin examinations of Ms. Valdivieso and of Ms. Velazquez	9.00	4,950.00
10/16/2023	Brian H. Pollock Esq.	Draft/revise	Further revise the propose Jury Instructions and Exhibit Lists (Pl's with Defs' objs, Defs with Pl's Objs) and exchange emails with defense counsel re: and enclosing same prior to finalizing them	0.90	495.00
10/17/2023	Steffany Sanguino	Paralegal	Revise the Joint Exhibit list.	0.60	99.00
10/17/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of Defendants' Motion to Permit Ms. Melendez to testify remotely; then, conduct legal research and draft Response in Opposition to same	2.00	1,100.00
10/17/2023	Brian H. Pollock Esq.	Legal	Revise and exchange emails with defense counsel re: the proposed Verdict Form	0.50	275.00
10/17/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Reply for the Motion for Leave	0.30	165.00
10/17/2023	Brian H. Pollock Esq.	Draft/revise	Draft email to Judge Dimitrouleas enclosing the proposed Verdict Form and Jury Instructions in compliance with the Trial Order	0.20	110.00
10/17/2023	Brian H. Pollock Esq.	Draft/revise	Conduct additional legal research and drafting of the Reply for our MIL	2.10	1,155.00

10/17/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Defendant's Response to the MIL then, begin to conduct additional legal research and drafting of the Reply for our MIL	3.10	1,705.00
10/17/2023	Steffany Sanguino	Paralegal	I called the client to change the start time of our meeting to 3 pm instead of 2 pm.	0.10	16.50
10/18/2023	Steffany Sanguino	Paralegal	I called the client to change the meeting date.	0.20	33.00
10/18/2023	Steffany Sanguino	Paralegal	Create a spreadsheet to incorporate all time and pay records and to calculate the OT owed to Ms. Valdivieso	3.30	544.50
10/18/2023	Brian H. Pollock Esq.	Attendance at	Prepare for and then attend hearing on our MIL re: issue 9 - profits/earnings	0.90	495.00
10/19/2023	Steffany Sanguino	Paralegal	Worked on the Plaintiff's Exhibit List.	4.00	660.00
10/19/2023	Steffany Sanguino	Paralegal	Worked on the Joint Exhibit List.	1.60	264.00
10/19/2023	Steffany Sanguino	Paralegal	I worked on the Plaintiff's Exhibit List with Defendant's Objections.	1.00	165.00
10/19/2023	Luna Alvey Esq.	Attendance at	Attendance at client meeting/trial preparation.	2.50	1,000.00
10/20/2023	Steffany Sanguino	Paralegal	Organize our trial files and computer file for trial; organize Exhibits and printed copies of same	2.50	412.50
10/20/2023	Luna Alvey Esq.	Federal Litigation - Plaintiff	Discuss trial date with client	0.10	40.00
10/20/2023	Brian H. Pollock Esq.	Attendance at	Prepare for and then attend Calendar Call; argued motion in limine and discussed pre-trial issues	3.50	1,925.00
10/20/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Memorializing Ruling re: Witness Angela Melendez	0.20	110.00
10/20/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Memorializing Rulings from the Bench re: MIL	0.20	110.00
10/24/2023	Brian H. Pollock Esq.	Draft/revise	Draft NOD Angela Melendez	0.30	165.00
10/25/2023	Luna Alvey Esq.	FLSA - Plaintiff	Telephone call with client regarding Angela Melendez.	0.20	80.00
10/25/2023	Steffany Sanguino	Paralegal	I called the JA to find out how many exhibit folders we should take for trial.	0.20	33.00
10/25/2023	Brian H. Pollock Esq.	Legal	Review time records and materials signed by Ms. Melendez and prepare for her deposition; then, take it	1.80	990.00
10/25/2023	Brian H. Pollock Esq.	Legal	Continue to prepare for trial and work on the examination of Plaintiff and the demonstrative for use in opening statement	2.90	1,595.00
10/26/2023	Brian H. Pollock Esq.	Legal	Continued trial preparations; work on examinations of Ms. Valdivieso, Ms. Ramirez, and Ms. Ramirez; review trial exhibits and work on demonstratives	6.30	3,465.00
10/27/2023	Brian H. Pollock Esq.	Draft/revise	Draft Motion to Bring Electronic Equipment and proposed Order Granting same	0.50	275.00
10/27/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of paperless Order Granting Motion to Bring Electronic Equipment into Courthouse	0.10	55.00
10/27/2023	Brian H. Pollock Esq.	Legal	T/c with Ms. Rowland in preparation for her testimony at trial	0.40	220.00
10/27/2023	Brian H. Pollock Esq.	Teleconference with	T/c with Ms. Valdivieso in preparation for trial	0.50	275.00



10/27/2023	Brian H. Pollock Esq.	Legal	Trial prep - work on examinations of the witnesses	5.20	2,860.00
10/29/2023	Brian H. Pollock Esq.	Legal	Prepare for trial, including demonstratives, examinations, voir dire, and opening	14.80	8,140.00
10/30/2023	Brian H. Pollock Esq.	Attendance at	Trial day 1 and prepare for Day 2	13.70	7,535.00
10/30/2023	Luna Alvey Esq.	Attendance at	Attendance at trial; translate for client; trial/witness strategy.	10.30	4,120.00
10/31/2023	Steffany Sanguino	Paralegal	Coordinate interpreter re: time change for trial attendance	0.20	33.00
10/31/2023	Steffany Sanguino	Paralegal	Talk with the interpreter's office to secure attendance at trial.	0.10	16.50
10/31/2023	Luna Alvey Esq.	Attendance at	Attendance at trial; translate for client; trial/witness strategy.	10.30	4,120.00
10/31/2023	Brian H. Pollock Esq.	Attendance at	Trial day 2; prepare for same, complete examination of Ms. McKinnon, cross of Ms. Melendez, and direct of Mrs. Valdivieso; then, prepare for trial day 3, including cross of Ms. Ramirez, closing arguments, conduct legal research re: issues raised by court, draft proposed additional instructions and verdict form issues	17.30	9,515.00
11/1/2023	Brian H. Pollock Esq.	Attendance at	Continued preparation for and attendance at trial day 3: cross examination of Ms. Ramirez, argue Rule 50 Motions, jury instructions, verdict form, closing, receive verdict.	11.00	6,050.00
11/2/2023	Steffany Sanguino	Paralegal	Attend trial, translate for client, assist attorney with trial tasks	10.50	1,732.50
11/2/2023	Brian H. Pollock Esq.	Legal	Conduct legal research and then draft M/Prejudgment Interest on the B/K Claim and calculate same	0.80	440.00
11/2/2023	Brian H. Pollock Esq.	Draft/revise	Receipt and review of the Final Judgment entered by Judge Dimitrouleas; then, draft email to Mr. Goldberg to confer regarding amending the final judgment to provide for pre-judgment interest and the several bases upon which Ms. Valdivieso intends to seek attorneys' fees from All VIP Care Inc. after prevailing on the Counterclaims	0.80	440.00
11/6/2023	Brian H. Pollock Esq.	Federal Litigation - Plaintiff	Draft the post-trial Joint Trial Exhibit List and compile Exhibits Used at Trial for filing in compliance with Local Rules	0.30	165.00
11/6/2023	Brian H. Pollock Esq.	Federal Litigation - Plaintiff	Review file and compile Bill of Costs	0.50	275.00
11/6/2023	Brian H. Pollock Esq.	Draft/revise	Draft Motion for Prejudgment Interest and calculations and legal research for same	1.00	550.00
11/6/2023	Brian H. Pollock Esq.	Draft/revise	Begin to conduct legal research and to draft M/Fees	2.20	1,210.00
11/7/2023	Brian H. Pollock Esq.	Draft/revise	Draft Notice of Non-Objection (to M/Withdraw)	0.30	165.00
11/7/2023	Brian H. Pollock Esq.	Draft/revise	Continue to conduct legal research and to draft M/Fees	4.10	2,255.00
11/7/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Deferring Ruling on M/Withdraw as Counsel	0.10	55.00
11/7/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Notice of Compliance by Mr. Goldberg	0.20	110.00
11/7/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring Motion for Bill of Costs	0.10	55.00
11/9/2023	Brian H. Pollock Esq.	Draft/revise	Continue to conduct legal research and to draft our M/Attorney's Fees	2.30	1,265.00

11/9/2023	Brian H. Pollock Esq.	Draft/revise	Draft Notice of Filing Unaccepted Proposal for Settlement (Counterclaims)	0.20	110.00
11/16/2023	Luna Alvey Esq.	Teleconference with	Telephone calls with client regarding potential for her to appeal, pre-judgment interest and state court case.	0.20	80.00
11/21/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting M/Withdraw (Mr. Goldberg)	0.20	110.00
11/21/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order of Instructions to Pro Se Litigant	0.20	110.00
11/21/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Stipulation for Substitution of Counsel	0.20	110.00
11/22/2023	Brian H. Pollock Esq.	Draft/revise	Exchange several emails with Ms. Perez re: her representation of Defendants and whether her client wants to resole the attorney's fees and costs issues	0.60	330.00
11/24/2023	Brian H. Pollock Esq.	Draft/revise	Exchange emails with Ms. Perez re: time and records in an attempt to resolve the fee issue	0.30	165.00
11/27/2023	Brian H. Pollock Esq.	Draft/revise	Further revise the proposed Motion for Fees and draft email to defense counsel enclosing same pursuant to Local Rule 7.3(a) (8)	0.90	495.00
12/5/2023	Luna Alvey Esq.	Draft/revise	Draft NOA	0.30	120.00
12/5/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's M/Bill of Costs	0.30	165.00
12/5/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Defendant's M/Extension of Time to File M/Fees	0.40	220.00
12/5/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring Def's Bill of Costs	0.10	55.00
12/5/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Order Referring Motion for Bill of Costs.	0.10	40.00
12/5/2023	Brian H. Pollock Esq.	Email Communication	Respond to Ms. Perez's email re: the extension to file Defendants' M/Fees by requesting the basis upon which either Defendant could seek fees	0.30	165.00
12/8/2023	Luna Alvey Esq.	Receipt, Review, and Analysis	Receipt, review and analysis of Order Granting Motion for Extension of Time to Comply with Local Rule 7.3 filed by Def.	0.10	40.00
12/13/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Civil Docketing Notice (for appeal)	0.20	110.00
12/13/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Eleventh Circuit Transcript Order Form by Defendants	0.20	110.00
12/14/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Appellants' Transcript Order Form	0.20	110.00
12/14/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Certification by Cristina Alonso, Esq., re: Transcript request	0.10	55.00
12/15/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Court Reporter's Acknowledgement	0.10	55.00
12/20/2023	Brian H. Pollock Esq.	Draft/revise	Conduct additional legal research and continue to draft/revise the M/Fees and Costs	2.80	1,540.00
12/21/2023	Brian H. Pollock Esq.	Draft/revise	Draft proposed Declaration for Ms. Valdivieso to sign if correct.	0.60	330.00
12/22/2023	Brian H. Pollock Esq.	Legal	Review time records and summaries to include information into final version of motion for fees	0.80	440.00
12/22/2023	Brian H. Pollock Esq.	Draft/revise	Continue drafting proposed Declaration for Ms. Valdivieso and conduct research in file for same; also, reach out to	0.80	440.00



12/22/2023	Brian H. Pollock Esq.	Email Communication	Exchange emails with Ms. Alonso re: her request for information for the Civil Appeals Statement and the amount demanded by Plaintiff and by Defendant at trial and review of file for same	0.30	165.00
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**Services Subtotal:167,700.50**

## Expenses

Date	Vendor	Category	Description	Total
8/22/2022	FairLaw Firm	Filing Fee - Federal Court	Filed complaint in Federal Court with Broward County.	402.00
9/2/2022	FairLaw Firm	Service of Process	Return of Service on Defendant John Corrigan #MIA4155	49.00
9/2/2022	FairLaw Firm	Service of Process	Return of Service on defendant Leigh-Ann #MIA4156	49.00
9/2/2022	FairLaw Firm	Service of Process	Service of Process on defendant All VIP Care, inc. #MIA4153	59.00
9/21/2022	FairLaw Firm	Service of Process	Invoice MIA 4154 accurate serve	98.00
5/23/2023	FairLaw Firm	Court Reporter Attendance / Transcript Costs	invoice 1636 depo of cr liz McKinnon	259.97
6/7/2023	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Depo. Diane Ramirez Attendance & Transcript (Inv.20518054)	939.85
6/12/2023	FairLaw Firm	Mediation Fees to Mediator		975.00
6/20/2023	FairLaw Firm	Certified Transcript	invoice 6747 transcripts of corp rep (D Ramirez)	788.25
7/6/2023	FairLaw Firm	Deposition transcripts	Transcript of Cruz Valdivieso Depo (Inv. 14764)	546.31
10/31/2023	FairLaw Firm	Court Reporter Attendance / Transcript Costs	Depo. Melendez (Attendance - Inv. 20518054)	95.00
10/31/2023	FairLaw Firm	Interpretation / Translator Attendance	Spanish interpreter's attendance at trial	720.00
11/1/2023	FairLaw Firm	Parking Fee	Parking for paralegal, Steffany Sanguino's attendance at trial	24.00
11/1/2023	FairLaw Firm	Parking Fee	Parking fee for Brian Pollock for 3 days of trial attendance	72.00
11/2/2023	FairLaw Firm	Parking Fee	Parking for trial - 10/30/2023 and 10/31/2023 - for Luna Alvey, Esq.	48.00

**Expenses Subtotal: 5,125.38**

## Notes:

**Total:172,825.88**

Please make all amounts payable to: FairLaw Firm. Tax ID No.: 20-1722656.

Payment is due upon receipt.

Thank you for your business.